

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
Docket No. 2022-93-E
Docket No. 2022-97-E**

In the Matter of:)
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Application of SR Lambert I, LLC for a Certificate of)
Environmental Compatibility and Public Convenience)
and Necessity for the Construction and Operation of a)
100 MW Solar Facility in Georgetown County, South)
Carolina Pursuant to S.C. Code Ann. § 58-33-10 et.)
seq., and Request to Proceed with Initial Construction)
Work, S.C. Code Ann. § 58-33-110(7).)
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In the Matter of:)
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Application of SR Lambert II, LLC for a Certificate of)
Environmental Compatibility and Public Convenience)
and Necessity for the Construction and Operation of a)
100 MW Solar Facility in Georgetown County, South)
Carolina Pursuant to S.C. Code Ann. § 58-33-10 et.)
seq., and Request to Proceed with Initial Construction)
Work, S.C. Code Ann. § 58-33-110(7).)
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**AMENDED AND SUPPLEMENTAL DIRECT TESTIMONY OF BLAIR WADE
ON BEHALF OF SR LAMBERT I, LLC AND LAMBERT II, LLC**

May 25, 2022

1 **Introduction and Qualifications**

2 **Q. Please state your name, your position and your business address.**

3 **A.** My name is Blair Wade. My business address is 4400 Leeds Avenue, Suite 450, North
4 Charleston, South Carolina. I am the Southeast Regional Renewables Lead and a Senior
5 Environmental Project Manager for HDR Engineering, Inc. (“HDR”). I and HDR have
6 been engaged to provide environmental services for the proposed SR Lambert I, LLC
7 (“Lambert I”) and SR Lambert II, LLC (“Lambert II”) solar projects (collectively, the
8 “Projects”) being planned and proposed for Georgetown County, South Carolina.

9 **Q. Have you previously provided testimony to the South Carolina Public Service
10 Commission?**

11 **A.** I submitted Pre-Filed Written Testimony as Exhibit E to the applications in these dockets,
12 which testimony I am now amending and supplementing.

13 **Q. On whose behalf are you providing testimony?**

14 **A.** I am providing testimony on behalf of applicants Lambert I and Lambert II (together, the
15 “Applicants”) and their parent company Silicon Ranch Corporation (“Silicon Ranch”).

16 **Q. Please describe your educational background and professional experience?**

17 **A.** I have a Bachelor of Science degree from James Madison University and a Master of
18 Environmental Management degree from Duke University, and 18 years of experience in
19 environmental permitting and natural resources planning. In particular, my environmental
20 planning practice has an emphasis on working with renewable energy projects throughout
21 the Southeast.

1 A copy of my *curriculum vitae* is provided as a supplement my testimony and attached
2 hereto as **Exhibit 1**.

3 **Q. What is the purpose of your testimony in this Proceeding?**

4 **A.** Lambert I and Lambert II are applying for certificates of environmental compatibility and
5 public convenience and necessity (“CECPCN”) for two solar photovoltaic (“PV”) energy
6 projects. Pursuant to the requirements of the CECPCN statute, my testimony will
7 summarize what studies have been undertaken by the applicants for the Projects, describe
8 the nature of expected environmental impacts, and provide an update on the status of
9 required consultation or permits with environmental agencies. Based on that information,
10 my testimony will show that, in my opinion, the applications for environmental permits are
11 complete and agency coordination is ongoing to promote timely issuance of permits for the
12 Projects.

13 **Q. As it relates to your testimony, please describe the Projects and their location.**

14 **A.** The Lambert I and Lambert II sites (the “Project Area”) encompass 2,082 acres in
15 unincorporated Georgetown County, South Carolina, located south of the town of Andrews
16 and east of the unincorporated Lambert area. The proposal is to develop two 100 MW PV
17 solar power generating facilities. The Project sites are currently owned by Resource
18 Management Service Timber Company, with which Silicon Ranch has an option agreement
19 to explore and develop the solar facilities. Based on historic aerial imagery and US
20 Geological Survey topographic maps, the Project Area has been in silviculture for over
21 fifty years. Vegetation, hydrology, and soil have been previously and significantly

1 disturbed. The Project Area is predominantly planted in loblolly pine; however, the site is
2 under active silviculture and large portions of the site have been timbered. A network of
3 ditches is present on the site that have altered hydrology. Soils have been disturbed by
4 bedding.

5 **Q. Please identify and describe any studies that have been conducted to understand what**
6 **if any environmental impacts of the Projects.**

7 **A.** To date, the Applicants, with the assistance of HDR, have performed the environmental
8 assessments, studies, or analyses set forth in the Projects' Permit Matrix, the current
9 version of which is attached hereto as **Exhibit 2**. Among the environmental analyses and
10 documents prepared, they include:

- 11 • Critical Issues Analysis (August 2019) (**Exhibit 3 to Application Exhibit E –**
12 **Wade Pre-Filed Written Testimony**)
- 13 • Phase I Environmental Assessment (July 27, 2020) (**Exhibit 4 to Application**
14 **Exhibit E – Wade Pre-Filed Written Testimony**)
- 15 • Cultural Resources Assessment (August 31, 2021) (**Exhibit 5 to Application**
16 **Exhibit E – Wade Pre-Filed Written Testimony**)
- 17 • US Fish & Wildlife - Federal Listed Species Effect Letter (December 9, 2021)
18 (**Exhibit 6 to Application Exhibit E – Wade Pre-Filed Written Testimony**)
- 19 • Federal Listed Species Effects Memorandum (December 8, 2021) (**Exhibit 7 to**
20 **Application Exhibit E – Wade Pre-Filed Written Testimony**)

- 1 • SC Dept. of Natural Resources – Species Effects (correspondence of January 4,
2 2022) (**Exhibit 8 to Application Exhibit E – Wade Pre-Filed Written**
3 **Testimony**)
- 4 • Pre-Filing Request (September 21, 2021)
- 5 • Wetlands Delineation
- 6 • Clean Water Act Section 404 Joint Permit Application and Section 401 Water
7 Quality Certification Request (December 20, 2021, since withdrawn)
- 8 • Coastal Zone Consistency Certification Request (December 20, 2021, since
9 withdrawn)
- 10 • Clean Water Act Section 404 Pre-Construction Notification (“PCN”) for
11 Nationwide Permit 51 and request for Section 401 Water Quality Certification
12 concurrence with conditions (May 25, 2022) (**Exhibit 3 hereto**)
- 13 • Coastal Zone Consistency Certification Request (May 25, 2022) (**Exhibit 4 hereto**)
- 14 **Q. Please identify the environmental permits and approvals you anticipate will be**
15 **necessary for the Projects.**
- 16 **A.** All required federal and state environmental permits have been identified for the Projects
17 as indicated in the current Permit Matrix, attached hereto as **Exhibit 2**. Required permits,
18 consultations, and certifications needed include:
- 19 • Clean Water Act (“CWA”) Section 404 Nationwide Permit 51 (U.S. Army Corps
20 of Engineers (“USACE”))

- 1 • CWA Section 401 Water Quality Certification (“401 WQC”) (South Carolina
2 Department of Health and Environmental Control (“SCDHEC”))
- 3 • Coastal Zone Consistency Certification (SCDHEC, Office of Ocean & Coastal
4 Resource Management (“OCRM”))
- 5 • National Historic Preservation Act (“NHPA”) Section 106 Consultation (SC
6 Department of Archives and History)
- 7 • Endangered Species Act Section 7 Consultation (US Fish & Wildlife, SC
8 Department of Natural Resources)
- 9 • CWA National Pollutant Discharge Elimination System (“NPDES”) General
10 Permit for Stormwater Discharges from Construction Activities (Coverage under
11 SCDHEC-OCRM, via Georgetown County Stormwater Division as Municipal
12 Separate Storm Sewer System operator)

13 **Q. What is the status of the cultural and historical analysis and consultation for the**
14 **Project Area, and what does it show?**

15 **A.** The Applicants engaged HDR to conduct a cultural resources assessment for the proposed
16 Project Area (**Exhibit 5 to Application Exhibit E – Wade Pre-Filed Written**
17 **Testimony**). The assessment was carried out pursuant to Section 106 of the NHPA. The
18 assessment was submitted to the SC Department of Archives and History, as the designated
19 State Historic Preservation Office (“SHPO”) for Section 106 consultation. SHPO

1 consultation ensures the review is performed in cooperation with federal and state agencies,
2 local governments, and private organizations and individuals.

3
4 From the assessment, no potential historic architectural resources or archaeological sites
5 eligible for the National Register of Historic Places (“NHRP”) were identified as being
6 located in the Project Area. While one NRHP-potentially eligible archaeological site was
7 identified within the 0.5-mile buffer surrounding the Project Area, it was confirmed that
8 none are located in the Project Area itself. The assessment identified no archaeological
9 resources in the Project Area. There are no historic architectural resources within or near
10 the Project Area. HDR recommended that no additional cultural resources survey of the
11 Project Area was necessary. In a letter responding to the assessment, the South Carolina
12 SHPO accepts the assessment as being final subject to being provided a final copy with all
13 underlying data (**Exhibit 5 to Application Exhibit E – Wade Pre-Filed Written**
14 **Testimony**). HDR provided printed copies of the final assessment to South Carolina SHPO
15 on September 22, 2021, and SHPO confirmed receipt on October 18, 2021.

16 Based on the assessment, there appears to be no cultural resources impact that would
17 prevent archaeological and historic architectural resource clearance for the Projects.

18 **Q. What is the status of the CWA Section 404 wetlands permit and what does the**
19 **wetlands analysis show?**

20 **A.** As required under Section 404 of the CWA, the Applicants have completed a wetland
21 delineation for the Project Area which has been submitted to the USACE as part of the

1 Joint Permit Application. While wetlands and waters as delineated have not been verified
2 or finally agreed upon as of yet by USACE, we do not anticipate material changes. Permit
3 drawings have been submitted to USACE as a part of the Applicants' Section 404 permit
4 application, as well as for other permit applications under the CWA. We submitted the 404
5 Permit application to USACE, 401 WQC application to SCDHEC, and Coastal Zone
6 Consistency certification request to OCRM on December 20, 2021. USACE and SCDHEC
7 issued a 30-day public notice for the Project on January 28, 2022. After an agency site visit
8 on February 16, 2022, Silicon Ranch and HDR reviewed the conceptual plans and
9 considered adjustments to the solar array configuration in an effort to avoid additional
10 wetlands.

11
12 Since completion of the public notice, HDR is in receipt of comments from SCDHEC and
13 OCRM, South Carolina Department of Natural Resources (SCDNR), US Environmental
14 Protection Agency, non-governmental organizations, and the public. In consideration of
15 these comments, HDR and Silicon Ranch have revised the proposed panel configuration
16 and plan to use a higher ground coverage ratio to avoid and minimize potential impacts to
17 wetlands and waters of the U.S. A PCN was submitted to USACE with SCDHEC in copy
18 on May 25, 2022 (**Exhibit 3 hereto**). A request for Coastal Zone Consistency was
19 submitted to OCRM on May 25, 2022 (**Exhibit 4 hereto**). Separate PCNs and Coastal
20 Zone Consistency requests are being submitted for the Lambert I Solar and Lambert II
21 Solar projects.

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Based on the conceptual designs prepared to date, potential wetland and stream impacts and proposed mitigation can be reasonably understood. Currently, the Lambert I Solar project is expected to result in approximately 0.165 acre of permanent wetland impact and 69 linear feet (0.014 acre) associated with the proposed solar facility. The Lambert II Solar project is expected to result in approximately 0.294 acre of permanent wetland impact. The panel arrays have been redesigned to minimize grubbing or grading within the wetlands. No impacts would occur to wetlands as a result of the access road construction. During conceptual design, the proposed gravel access roads were realigned with the existing logging roads to minimize impacts to wetlands. Access roads were also shortened or shifted to avoid further permanent impacts to wetlands. Temporary sediment basins and the proposed substations are located in upland areas of the site. Wildlife fencing may cross narrow portions of wetlands; piles supporting the fencing would be driven in and would not be trenched in or stabilized with concrete. Hand clearing in wetlands within 200-feet of the proposed panels may occur to prevent shading of panels or potential impacts from tree fall. Every 3 to 5 years, hand-clearing will occur within 200-feet of the proposed panels to prevent mature trees from shading the panels. Herbaceous and scrub-shrub vegetation will be allowed to remain.

The waterflows identified in the Project Area have been channelized and/or are roadside ditches. Approximately 69 linear feet of stream impact is proposed on Lambert I Solar to

1 install an access road to the proposed substation and replace a damaged existing culvert.
2 Interior site access to the substation is needed for security and operations and maintenance
3 purposes. A pipe or culvert would be placed in the stream to maintain existing hydrology.
4 Solar panels may be placed on either side of streams or ditches but would not result in any
5 impacts.

6
7 When considering these impacts, it is important to recall the past and current use of the
8 Project Area. In the case, the Project Area and wetlands within have been heavily utilized
9 for silviculture for many years. The Project Area has been managed for timber production
10 for over fifty years and various portions of the Project Area are either currently undergoing
11 active silviculture management or have been recently cleared. As a result of these uses,
12 wetland hydrology, soils, and vegetation have previously been altered and already have
13 very impaired functions.

14 **Q. Of the other environmental permits required for the Projects, what are their status?**

15 **A.** A Notice of Intent, including an erosion and sediment control plan and stormwater
16 pollution prevention plan, will be submitted to obtain NPDES coverage under SCDHEC's
17 Construction General Permit for Stormwater Discharges from Large and Small
18 Construction Activities to SCDHEC and Georgetown County in or around July 2022. HDR
19 anticipates concurrent review of the Notice of Intent and associated plans, with SCDHEC
20 issuing approval first followed by Georgetown County. A Coastal Zone Consistency will
21 also be required for the stormwater permit.

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The Applicants have completed consultation with the USFWS and SCDNR regarding threatened and endangered species. No federally listed threatened or endangered species were found in the Project Area and no further consultation or wildlife permitting is necessary.

Q. What are the overall environmental impacts expected from the Projects?

A. As demonstrated in the attached environmental analyses and permit applications, the Projects will result in no significant impacts. For each of the Projects, the Applicants will comply with permits and their conditions, once received by the agencies, including mitigation.

Apart from permitting, the Projects by their nature provide valuable environmental benefits. The Projects will provide clean renewable power with minimal environmental impacts. Silicon Ranch commits to conducting any project clearing between November 15 and March 31. Non-invasive, native wetland vegetation will be planted beneath a portion of the solar panels. Vegetation and land management practices, including pollinator plantings, will be used to increase the overall biodiversity of the site and conditions of the soils. Wildlife fencing with larger holes on the bottom will be used on the site, which allows for the passage of small mammals and other animals. Visual buffers will be planted between panels and adjacent houses. While minor, short-term noise and air quality impacts may occur during construction, they will be comparable to the noise and air emissions

1 generated by timber activities currently being conducted on the Site. Once the facility is
2 operational, there will be no permanent noise or air impacts to the surrounding area.

3 **Q. Do you expect that the Applicants will be able to timely obtain all environmental**
4 **permits?**

5 Based on the detailed site due diligence and environmental studies to date, I believe that
6 there are no conditions which should adversely affect the Projects' ability to obtain all
7 permits needed to maintain environmental compliance.

8 **Q. Will you update your testimony based on information that becomes available?**

9 **A.** Yes. I will revise and add to my testimony on behalf of Lambert I and Lambert II via
10 supplemental or amended testimony if new information becomes available or known. If
11 there are design changes or new regulations which impact permitting, the Applicants will
12 submit timely amendments and I will update my testimony as appropriate.

13 **Q. Does this conclude your testimony?**

14 **A.** Yes. Thank you for the opportunity to provide my sworn testimony in this important matter,
15 and I further look forward to providing live testimony if needed.